

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,)
)
) Criminal Docket No.
v.) CR-20-0220 (JMA)
)
THOMAS BLAHA,)
)
)
 Defendant,)
)
)
and)
)
MEMORY PROTECTION DEVICES, INC.)
)
)
 Garnishee.)

WRIT OF CONTINUING GARNISHMENT

GREETINGS TO: **Memory Protection Devices, Inc.**
c/o Carl Koerner, Counsel
White and Williams LLP
7 Times Square, Suite 2900
New York, NY 10036

This Writ of Continuing Garnishment is issued, pursuant to the filing of an Application for a Writ of Continuing Garnishment by the United States, against property, including nonexempt disposable earnings, in which the Defendant-Judgment Debtor (“Debtor”) Thomas Blaha has a substantial nonexempt interest, including nonexempt disposable earnings, in order to satisfy the judgment, in the amount of \$963,877.00 entered in United States v. Thomas Blaha, Criminal Docket CR-20-0220 (E.D.N.Y.).

The sum of \$454,012.38 has been credited toward the judgment, leaving a total balance due of \$509,864.62, as of August 16, 2023.

Debtor's last known address is: Thomas Blaha, 92291-053, FCI Fort Dix, Federal Correctional Institution, P.O. Box 2000, Joint Base MDL, NJ, 08640.

The Garnishee, Memory Protection Devices, Inc., is required to serve a written answer within ten (10) days of service of the Writ of Continuing Garnishment.

In its answer, the Garnishee must provide the following under oath:

- a. Whether the Garnishee has in its possession, custody or control any property of the Debtor, including non-exempt, disposable earnings;
- b. A description of such property and the value of such interest;
- c. A description of any previous garnishments to which such property is subject and the extent to which any remaining property is not exempt; and
- d. The amount of the debt or other payments the Garnishee anticipates owing or paying to the Debtor in the future and whether the period for payment will be weekly or another specified period.

The Garnishee must file the original written answer to this writ within ten (10) days of receipt of this writ with Clerk of the Court at the following address:

Clerk of the Court
Eastern District of New York
United States Courthouse
225 Cadman Plaza East, Rm. 130
Brooklyn, New York 11201

The Garnishee is further required to serve a copy of this answer upon the following:

John Murtaugh, Esq.
Attorney for Thomas Blaha
MURTAGH, COSSU, VENDITTI & CASTRO-BLANCO, LLP
1133 Westchester Ave – Suite N-202
White Plains, New York 10604

and

Thomas Blaha, 92291-053
FCI Fort Dix
Federal Correctional Institution
P.O. Box 2000
Joint Base MDL, NJ, 08640

and

The Estate of David Kassel
c/o Lauren Nakachi
MCCARTER & ENGLISH
100 Mulberry Street
Newark, NJ 07102

and

Daniel G. Saavedra
Assistant U.S. Attorney
United States Attorney's Office
Attorney for the United States
271 Cadman Plaza East
Brooklyn, New York 11201.

In accordance with the Writ of Continuing Garnishment, the Garnishee is further required to withhold and retain, pending further order of the court, any property, including nonexempt disposable earnings, in which the Debtor has a substantial non-exempt interest and for which the Garnishee may become indebted to the Debtor.

Under the law, certain property may be exempt from this Writ of Continuing

Garnishment. Property which may be exempt and may not be subject to this order is listed on the attached Claim for Exemption form.

If the garnishee fails to answer the writ of continuing garnishment or withhold property in accordance with the writ, the United States may petition the court for an order requiring that the garnishee appear before the court to answer the writ and to so withhold property before the appearance date. If the garnishee fails to appear or appears and fails to show good cause why the garnishee failed to comply with the writ, the court shall enter judgment against the garnishee for the value of the debtor's nonexempt interest in such property (including non-exempt disposable earnings). The court may award a reasonable attorney's fee to the United States and against the garnishee if the writ is not answered within the time specified therein and a petition requiring you to appear is filed as provided herein.

Pursuant to 15 U.S.C. §1674, the Garnishee is prohibited from discharging the Debtor from employment by reason of the fact that his earnings have been subject to garnishment for any one indebtedness.

It is unlawful to pay or deliver to the Debtor any item attached by this writ.

Dated: August 16, 2023

HONORABLE BRENNA B. MAHONEY
Clerk of the Court
United States District Court
Eastern District of New York

By: _____
DEPUTY CLERK